

## REMARKS

In view of the preceding amendments and the following comments, and pursuant to 37 C.F.R. § 1.111, Assignee respectfully requests reconsideration of the Non-Final Office Action mailed November 01, 2007 ("Office Action").

### Summary

The Office Action mailed on November 01, 2007 provided grounds for rejection of claims 1-31. Assignee has amended independent claims 1, 20 and 21, and dependent claims 14, 16, 19, 25, and 29. Claims 1 and 20 have been amended to include the features of dependent claims 13 and 15. The features of dependent claim 28 were incorporated into claim 21. Assignee has canceled claims 13, 15, and 28. Support for the amendments to claims can be found in the Application at least at ¶¶ 0100-0107. The Assignee respectfully request reconsideration of pending claims 1-12, 14, 16-27, and 29-31, and allowance of the present application in view of the following remarks.

#### I. Rejections Under 35 U.S.C. § 101

The Office Action rejected claims 1-19 under 35 U.S.C. §101, indicating that the claimed invention is not supported by either an asserted utility or a well established utility.

Assignee respectfully traverses these rejections. As an initial matter, Assignee notes that MPEP 2106.01 indicates that "a physical or logical relationship among data elements, designed to support specific data manipulation functions" is statutory subject matter.

Independent claim 1 recites the formation of multiple concise account level decision relationships used to construct multiple concise account level decision queries. Claim 1 further recites logic operable to execute the multiple concise account level decision queries. In other words, claim 1 describes a logical relationship among data elements by claiming the formation of multiple concise account level decision relationships, and the relationships are designed to support specific data manipulation functions, specifically the logic operable to execute the queries. Claim 1 indicates that at

least one of the problems solved by the claims includes the formation of multiple concise account level decision relationships used to construct the multiple concise account level decision queries. Accordingly, in compliance with MPEP 2106.01 claim 1 already recites statutory subject matter. However, in order to further clarify the statutory subject matter of claim 1, claim 1 has been amended to recite that the logic is operable to execute the queries to **obtain multiple concise account level decision query results** used to perform account level decision analysis. Therefore, independent claim 1 and dependent claims 2-19, which depend from claim 1, recite patentable subject matter. In view of the amendments to independent claim 1, these rejections are respectfully traversed.

## II. Rejections Under 35 U.S.C. § 112

The Office Action rejected claims 1-19 under 35 U.S.C. § 112, indicating that the claimed invention is unsupported by either an asserted utility or a well established utility for which one skilled in the art clearly would know how to use the claimed invention.

In view of the amendments to independent claim 1, and the remarks above regarding the 35 U.S.C. § 101 rejections, the rejections under 35 U.S.C. § 112 are respectfully traversed.

Assignee also notes that the application asserts at least one utility, indicating that a "query may use the account and/or account involvement entity classes to determine which customer is associated with the specified account in order to retrieve information." Application at ¶ 0089. In addition, the application indicates that the "user interface module 110 generally includes a self-contained language ('SQL') or a host language or legacy system for communicating with the database system 130." Application at ¶ 0044. Thus, the application provides support for claims 1-19, which describe statutory subject matter sufficiently such that a person skilled in the art clearly would know how to use the claimed invention and would readily understand that the claims have a credible utility for enhanced functionality of a database and information retrieval system. Moreover, the application discloses that the claimed invention is applicable to support, for example, the database and information retrieval system for an insurance

underwriting workflow system. Application at ¶¶ 0002, 0006, 0071, and 0080-0087. Accordingly, Assignee submits the claimed inventions have either an asserted utility or a well established utility.

### **III. Rejections Under 35 U.S.C. § 103(a)**

The Office Action rejected claims 1-2, 4, 6, 8-12, 20 and 25-26, under 35 U.S.C. §103(a) as being unpatentable over Dimitrios et al. (U.S. Patent No. 5,659,723) in view of Guy et al. (U.S. Patent Application Publication No. 2003/0172039 A1). The Office Action rejected claims 3, 5, 7, and 22-24, under 35 U.S.C. §103(a) as being unpatentable over Dimitrios and Guy and further in view of Kennedy et al. (U.S. Patent Application Publication No. 2003/0187826 A1). The Office Action rejected claims 13-19, under 35 U.S.C. §103(a) as being unpatentable over Dimitrios and Guy and further in view of Ariathurai (U.S. Patent application Publication No. 2002/0198743 A1). The Office Action rejected claims 21, and 27-31, under 35 U.S.C. §103(a) as being unpatentable over Dimitrios in view of Guy and further in view of Moore (U.S. Patent No. 5,446,885).

#### Claims 1-19

Claim 1 has been amended to include the features of claims 13 and 15, which makes the rejection of claim 1 moot. Claim 1, as amended, recites an offering involvement entity class establishing a relationship between at least one of the customer data objects and one of the offering data objects. Claim 1, as amended, further recites the offering entity class comprises a program entity class, wherein the program entity class establishes relationships between multiple service data objects and multiple product data objects. The Office Action indicates that Dimitrios, in combination with Guy, discloses all the features of claim 1. However, Dimitrios, alone or in combination with Guy (the "Dimitrios-Guy" combination), does not disclose a program entity class that establishes relationships between multiple service data objects and multiple product data objects as described in claim 1.

Instead, Dimitrios describes a method for automatically translating application program modeling data expressed in entity/relationship terminology into computer application program model data expressed in object oriented terminology. Guy is directed to a system for managing credit card accounts. Guy describes a role identifier that permits account criteria to be established for individual cardholders. However, neither Dimitrios nor Guy, alone or in combination, describes a program entity class that establishes relationships between multiple service data objects and multiple product data objects. Thus, claim 1 is patentable over the Dimitrios-Guy combination. Therefore, independent claim 1 and dependent claims 2, 4, 6, 8-12, which depend from claim 1, are patentable over the Dimitrios-Guy combination.

Claim 1, as amended, recites an offering entity class for establishing multiple offering data objects. The Office Action asserts that Dimitrios and Guy in combination with Ariathurai (the "Dimitrios-Guy-Ariathurai" combination) discloses an offering entity class and an offering involvement entity class as described in claim 1. However, Ariathurai is directed to a network architecture and management system that enables an insurance agent to transfer insurance data between servers of different insurance carriers and computers of insurance agents, customers and others over a network. The Dimitrios-Guy-Ariathurai combination does not teach or suggest an offering involvement entity class that establishes a relationship between a customer data object and an offering data object. The Dimitrios-Guy-Ariathurai combination also does not teach or suggest a program entity class that establishes relationships between multiple service data objects and multiple product data objects.

Instead, Ariathurai, at ¶¶ 0007-0008, describes a traditional agency website as providing a quote form which enables prospective customers to enter information into a form and e-mail the form to an agent, and indicates that some agency websites now enable prospective customers to obtain on-line policy quotes by predetermined insurance carriers. The Dimitrios-Guy-Ariathurai combination does not teach or suggest that the agency websites, described in ¶¶ 0007-0008, are, or include, or result in an offering involvement entity class that establishes a relationship between a customer data object and an offering data object. Ariathurai indicates, at ¶ 0115, that the network

architecture described therein enables agents, affiliates, customers and carriers to transfer information to one another, such as the list of documents illustrated in FIG. 12. The Dimitrios-Guy-Ariathurai combination does not teach or suggest that the list of documents illustrated in FIG. 12 is, or includes, or results in an offering involvement entity class that establishes a relationship between a customer data object and an offering data object. Ariathurai, at ¶ 0122, indicates that FIG. 14 illustrates a list of tools for managing contact information, creating accounts, creating policies, creating invoices, entering payments and tracking payments and other transactions, generating reports, graphs and tables, generating statements, searching for information and data, posting messages to and from agents and affiliates, interfacing with existing accounting systems, and enabling users to customize graphical interfaces and other aspects of the tools. The Dimitrios-Guy-Ariathurai combination does not teach or suggest that the list of tools illustrated in FIG. 14 is, or includes, or results in an offering involvement entity class that establishes a relationship between a customer data object and an offering data object. Therefore, the Dimitrios-Guy-Ariathurai combination does not show all the features of claim 1. Thus, claim 1 is patentable over the references for these reasons.

The Application, at ¶ 0116, indicates that the three-tiered structure described therein enables the ability to combine products and services together to create programs that are tailored to an account. However, Ariathurai, at FIGS. 12 and 14, illustrate a list of documents and a list of tools, respectively. The Dimitrios-Guy-Ariathurai combination does not teach or suggest that the list of documents and/or the list of tools are, or include, or result in an offering entity class that includes a program entity class, wherein the program entity class establishes relationships between multiple service data objects and multiple product data objects. Ariathurai uses the word product only once, at ¶ 0016, to indicate that the term "customer," includes an actual, potential or prospective insured party or purchaser of insurance, financial or other **products OR** services provided by an agent, affiliate or carrier. In other words, Ariathurai does not describe products and services in combination. In contrast to claim 1, the Dimitrios-Guy-Ariathurai combination does not teach or suggest a program entity class that establishes relationships between multiple service data objects and multiple

product data objects. Moreover, the Dimitrios-Guy-Ariathurai combination does not teach or suggest offerings or programs that include a combination of products and services. Therefore, the Dimitrios-Guy-Ariathurai combination does not show all the features of independent claim 1. Thus, claim 1, from which claims 14, 16, 17, 18, and 19 depend, is patentable over the Dimitrios-Guy-Ariathurai combination. For at least the same reasons as stated above and for the independently patentable features recited by claims 14, 16, 17, 18 and 19, which depend from claim 1, claims 14, 16, 17, 18 and 19 are patentable over the Dimitrios-Guy-Ariathurai combination.

Dependent claims 3, 5, and 7 describe an account entity that includes a first account ID attribute defined as a primary key, an account group entity that includes an account ID attribute defined as a foreign key, and a customer entity that includes a first customer ID attribute as a primary key, respectively. Claim 1, from which claims 3, 5, and 7 depend, describes a program entity class that establishes relationships between multiple service data objects and multiple product data objects. The Office Action indicates that Dimitrios and Guy, in combination with Kennedy (the "Dimitrios-Guy-Kennedy" combination), discloses all the features of claims 3, 5, and 7. However, Dimitrios, Guy and Kennedy, alone or in any combination, do not show all the features of claim 1, from which claims 3, 5, and 7 depend, such as a program entity class that establishes relationships between multiple service data objects and multiple product data objects.

Instead, Kennedy is directed to a data model for an automated collection system for delinquent accounts, and describes account collection representatives as users of the collection system. Kennedy indicates at ¶ 0046 that the invention described therein may be adapted for a variety of receivables management or collection applications including, but not limited to, current or pre-charge-off early stage delinquencies, pre-charge-off late stage delinquencies, internal and outsourced collection efforts, charge-off, bad debt, recovery, collection litigation, probate, and bankruptcy. The Dimitrios-Guy-Kennedy combination does not teach or suggest a program entity class that establishes relationships between multiple service data objects and multiple product data objects. Therefore, the Dimitrios-Guy-Kennedy combination does not show all the

features of claim 1. Thus, claim 1, from which claims 3, 5 and 7 depend, is patentable over the Dimitrios-Guy-Kennedy combination. Therefore, claims 1, 3, 5, and 7 are patentable over the references for these reasons.

Claims 20, and 22-26

Claim 20 has been amended to include the features of claims 13 and 15, which makes the rejection of claim 20 moot. Claim 20 is directed to a system that includes an offering entity class for establishing multiple offering data objects and an offering involvement entity class establishing a relationship between at least one of the customer data objects and one of the offering data objects. Claim 20 indicates that the offering entity class comprises a program entity class, wherein the program entity class establishes relationships between multiple service data objects and multiple product data objects. The Office Action indicates that the Dimitrios-Guy combination discloses all the features of claim 20. However, Dimitrios, alone or in combination with Guy, does not disclose a program entity class that establishes relationships between multiple service data objects and multiple product data objects as described in claim 20.

Instead, Dimitrios describes converting entity/relationship data input into object oriented and hierarchically arranged object classes, instances and properties. Guy describes a system for managing accounts, wherein more than one customer may be associated with each account, wherein each customer has a role relating to such account. The Dimitrios-Guy combination does not teach or suggest a system that includes a program entity class that establishes relationships between multiple service data objects and multiple product data object. Thus, claim 20 is patentable over the Dimitrios-Guy combination. Therefore, independent claim 20 and dependent claims 22-26, which depend from claim 20, are patentable over the Dimitrios-Guy combination. For at least the same reasons as stated above and for the independently patentable features recited by claims 22-26, which depend from claim 20, claims 22-26 are patentable over the Dimitrios-Guy combination.

The Office Action asserts that Dimitrios and Guy in combination with Ariathurai (the "Dimitrios-Guy-Ariathurai" combination) discloses an offering entity class and an

offering involvement entity class as described in claim 20. However, the Dimitrios-Guy-Ariathurai combination does not teach or suggest an offering involvement entity class that establishes a relationship between a customer data object and an offering data object. The Dimitrios-Guy-Ariathurai combination also does not teach or suggest a program entity class that establishes relationships between multiple service data objects and multiple product data objects. Therefore, the Dimitrios-Guy-Ariathurai combination does not show all the features of claim 20. Thus, claim 20, from which claims 22-26 depend, is patentable over the references for these reasons. For at least the same reasons as stated above and for the independently patentable features recited by claims 22-26, which depend from claim 20, claims 22-26 are patentable over the Dimitrios-Guy-Ariathurai combination.

Claims 21, and 27-31

Claim 21 has been amended to include the features of claim 28, which makes the rejection of claim 21 moot. Claim 21, as amended, recites providing a program entity class that establishes relationships between the service data objects, the product data objects and the risk data objects. Claim 21 further recites that the risk data objects define risk factors associated with **addressing risks to customers and accounts**, comprising: risk factors addressed by products; and risk factors addressed by services. The Office Action asserts that Dimitrios, in combination with Guy and Moore (the "Dimitrios-Guy-Moore" combination) show all the features of claim 21. However, Dimitrios, Guy, and Moore, alone or in any combination, do not teach or suggest a program entity class that establishes relationships between the service data objects, the product data objects and the risk data object, wherein the risk data objects define risk factors associated with **addressing risks to customers and accounts**.

Instead, Moore is directed to rule-based management information systems and in particular to financial and banking management information systems for determining the financial risk and exposure of the institution. Moore describes, at col. 17, ll. 3-16, a process that defines the applicable risk types **affected by** a specific product and its associated transaction. In other words, Moore describes a system that performs risks



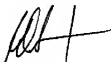
and exposure calculations associated with addressing risks to an institution for products offered to customers by the financial institution. The Dimitrios-Guy-Moore combination does not teach or suggest the type of risk described by claim 21. Neither Dimitrios, nor Guy, nor Moore, alone or in any combination, teach or suggest a program entity class that includes risk data objects that define risk factors associated with **addressing risks to customers and accounts**, comprising: risk factors addressed by products; and risk factors addressed by services. The Application, at ¶ 0100, describes providing insurers an opportunity to view risks in the context of the business needs of a customer (company). In other words, claim 21 describes products and services offered to customers to address **risks to the customers**, in contrast to addressing the risk to a financial institution with a product offered by the financial institution to customers. The Application, at ¶ 0091, describes establishing relationships used to identify "more granular risk patterns for underwriting and therefore greater precision in risk assessment." Because the type of risk and the relationships defined between risk, customers, accounts, products and services, used to provide the granular risk patterns described by claim 21 are distinguishable from the risk taught by the Dimitrios-Guy-Moore combination, claim 21 is patentable over the references. Even if the Dimitrios-Guy-Moore combination were proper, the combination at best teaches or suggests products that address the risk to an institution offering those products to customers. Therefore, claim 21 is patentable over the Dimitrios-Guy-Moore combination. Thus, independent claim 21 and dependent claims 27 and 29-31, which depend from claim 21, are patentable over the Dimitrios-Guy-Moore combination.

For at least the same reasons as stated above and for the independently patentable features recited by claims 27 and 29-31, which depend from claim 21, claims 27 and 29-31 are patentable over the Dimitrios-Guy-Moore combination.

**Conclusion**

In view of the above remarks, Assignee respectfully submits that this application is in condition for allowance and such action is earnestly requested. If for any reason the Application is not allowable, the examiner is requested to contact the Assignee's undersigned attorney at (312) 321-4200.

Respectfully submitted,



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